

July 18, 2019

10:00 am

Notes from EPA & Georgia EPD FY2020 Inspection Planning Conference Call Meeting

EPA Region 4

César A. Zapata, Acting Branch Chief AEB

Todd Russo, Section Chief, AEB

Jason Dressler, Acting Section Chief, AEB

Kevin Taylor, Env. Engineer, Note Writer

Megan Arias, Env. Engineer (on the phone)

Georgia EPD

Karen Hays, Air Protection Branch Chief

Sean Taylor, Stationary Source Compliance Program Manager

Michael Odom, former Air Toxics Unit Manager (now Mobile Source and Area Source Program Manager)

The discussion led with introductions. César Zapata greeted Karen Hays and the EPD team and noted his role as acting branch chief for the AEB. Todd Russo discussed the reorganization and some of the new areas, such as EPCRA, Asbestos, CERCLA, that are now with the AEB.

Todd Russo outlined the NCI areas of focus.

1. The first area was Creating Cleaner Air..., which was shortened to Excess Emissions. The Excess Emissions category will combine energy extraction with air toxics excess emissions. For air toxics, the focus is on the MON wastewater requirements for complex, high emitting sources, and NESHAP 6B for nonattainment areas. Due to past activities in Georgia, there are no planned inspections for these two categories of sources currently. AEB is also looking at Subpart DD for solvent recovery as an area of interest.

When asked about targeting suggestions, Sean Taylor highlighted the Pinova facility, located in Brunswick, GA. He is not sure that if it has wastewater regulated under the MON, but it is a MON source that has had past compliance problems, mainly in the area of recordkeeping and reporting. Todd Russo stated that we will investigate including it in the targeting.

2. The second area was Stopping After Market Defeat Devices. EPA has 5 credentialed inspectors for this area and they will be targeted primarily using tips. It was pointed out that Michael Odom has been selected as the new Mobile Source and Area Source Program Manager. Under the EPD program, there are some requirements for mobile sources that they enforce. When asked if the EPD would like notifications before EPA conducts these direct implementation inspections, the answer was Yes.
3. Reducing Risk of Accidental Releases. This is primarily the RMP program, which EPD has delegation. EPA's focus is on targeting sources in nondelegated states so, presently, Georgia may not be targeted for RMP inspections for FY2020.

4. Other Regional AEB Activities

- a. Mobile Source Imports – AEB already has a relationship with Customs and Border Patrol (CBP) in Savannah and Jacksonville. AEB will continue to look at shipments for FY2020. The only Georgia inspections conducted so far was the training activity held in Savannah in December 2018. When asked whether EPD wanted to receive notification of these inspections, Karen Hays stated that she would like to get a notification of when the inspections occur but would probably not send an inspector to accompany EPA. By contacting her, she can contact the EPD Coastal District Office to let them know that EPA is in the area.
- b. Asbestos – Although Georgia gave the asbestos delegation back to EPA, Todd Russo stated that he heard that EPD inspectors still go the sites. Karen Hays stated that Chuck Mueller's (the Land Protection Branch Chief) group may look at some air side issues outside of NESHAP as it relates to landfills.
- c. EPCRA – this is a federally implemented program and HQ typically issues a listing of inspections in December. However, the AEB has a preliminary listing of potential inspection targets, but the list may change based on what comes out of HQ in December. Karen Hays stated that she will like to receive notification of the inspections.
- d. Shredders – AEB has an inspector from R5 on detail that has been conducting shredder inspections. The results are still being evaluated. Right now, the focus is on compliance determinations for the inspections that were conducted. When asked about the timing of the determination, it was pointed out that, although these inspections were conducted this fiscal year, the inspections were followed up with information requests that take some time to review and to ensure that the information is responsive.
- e. Energy Extraction – this is now combined with air toxics excess emissions. The focus for FY2020 is on NSPS OOOO and OOOOa. There may be a facility in Macon, but the information needs to be verified. Karen Hays stated that she knew of the Hartwell Compressor Station in North Georgia being subject to NSPS OOOOa. She also stated that there have been no problems with the source noted by EPD.
- f. Lead – this is not an NCI area, but EPA is looking at lead sources in each state. For Georgia, two sources came up on the list, Trojan Battery in Lithonia and U.S. Battery in Augusta. Karen Hays stated that Trojan had some testing problems a few years back but has a leak detection system installed on its baghouse. For Georgia, Exide in Columbus was the problem source for lead, but it has since been shut down. The permit has not been revoked but there are no plans for the facility to restart. Todd Russo stated that there are no planned inspections at this time, but EPA is still evaluating. When a finalized listing of inspections is received, AEB will reach out to the EPD again to coordinate.
- g. Open Discussion for the Georgia EPD – Karen Hays stated that she could not think of any areas of concerns needing EPA help or coordination. However, she did ask where EPA was on revising NSPS Subpart XXX for municipal landfills. She was concerned about the overlap with NSPS Subpart WWW and state plans are due next month. Todd Russo

stated that he would touch base with David McNeal for an update on the landfill rule and possible revisions.

- h. Ethylene Oxide – Karen Hays stated that EPD has emission data for the two ethylene oxide sources, Sterigenics and CR Bard, and the emissions come out as lower than what the NATA data shows. It was stated that EtO can also come from combustion sources. Sterigenics has informed EPD that it will install additional controls, but they have not submitted an application for it yet. Overall, the EtO sources in Georgia are in compliance with the MACT, as it is applied today.
- i. Todd Russo offered to Georgia any assistance AEB can provide with the FLIR and other field equipment, if it is needed.
- j. Training – Karen Hays stated that SESARM will provide stack testing training in October, but this training has been a concern for EPD for a while. Todd Russo stated that, if David Abbott has a list of upcoming training, he would share that with EPD.
- k. CMS – the question of when are CMS plans due came up. AEB will investigate whether there is a policy deadline and, if so, what is it.

To Do List

1. Question on landfills and a revision to NSPS Subpart XXX – contact David McNeal.
2. Follow up on any training schedule that David Abbott may have.
3. When are the CMS plans due. (A letter with the due date needs to be drafted.)